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35240-001

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Via ECF

Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court
Mitchell H. Cohen U.S. Courthouse
400 Cooper Street, 4th Floor
Camden, New Jersey 08101

Re: Daryl Fred Heller
Ch. 11; Case No. 25-11354 (JNP)

Dear Judge Poslusny:

As Your Honor is aware, this firm represents Daryl Fred Heller, the Chapter 11 debtor and debtor-in-possession (the “Debtor”) in the above referenced matter.

This letter serves as a reply to the objection (the “Objection”) (ECF 223) filed by Orrstown Bank (“Orrstown”) to McManimon Scotland & Baumann LLC’s (“MSB”) application for an Order authorizing release of funds from MSB’s attorney trust account to pay MSB’s fees and cost (the “Application”) (ECF 207).

The Objection is limited to that fact that “So long as \$835,000 remains in the MSB Account (A) for the benefit of Orrstown Bank and (b) subject to further Order of this Court prior to the disbursement, Orrstown Bank does not object to the request in the Application.” See Objection, ¶ 3.

As of today’s date, there remains \$1,564,151.95 in the MSB Attorney Trust Account in connection with the sale proceeds of the Sea Isle, New Jersey home. The Application only requests authority to disburse \$123,163.34 for fees and costs from the MSB Attorney Trust Account from the sale proceeds. Thus, the MSB Attorney Trust Account will continue to hold the request of \$835,000 on account of Orrstown’s position in its Objection. Furthermore, MSB is holding \$31,307.50 (“Retainer Funds”) pursuant to a pre-petition retainer. As a result of the Retainer Funds, MSB is only requesting to draw down \$91,855.84 from the MSB Attorney Trust Account holding the sale proceeds.

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Therefore, we respectfully request, the proposed Order Authorizing Release of Funds from McManimon Scotland & Baumann LLC's Attorney Trust Account for Payment of Attorney's Fees and Costs Pursuant to the Administrative Fee Order be entered.

As always, Your Honor's courtesy is much appreciated.

Respectfully submitted,

/s/ Sari B. Placona

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SBP/sll